

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Asghari-Kamrani et al.
U.S. Patent No.: 8,266,432 Attorney Docket No.: 36137-0007IP1
Issue Date: September 11, 2012
Appl. Serial No.: 12/210,926
Filing Date: September 10, 2008
Title: CENTRALIZED IDENTIFICATION AND AUTHENTICATION SYSTEM AND METHOD

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 8,266,432 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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C. [GROUND 3] – Neuman Renders Obvious Claims 4, 5, 29, and 3059

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EXHIBITS

USAA-1001	U.S. Patent No. 8,266,432 to Asghari-Kamrani et al. (“the ‘432 Patent” or “‘432”)
USAA-1002	Excerpts from the Prosecution History of the ‘432 Patent (“the Prosecution History”)
USAA-1003	Declaration of Dr. Seth Nielson re the ‘432 Patent (“Nielson”)
USAA-1004	Curriculum Vitae of Dr. Seth Nielson
USAA-1005	U.S. Patent No. 7,356,837 (“the ‘837 Patent” or “‘837”), a parent of the ‘432 Patent
USAA-1006	RESERVED
USAA-1007	RESERVED
USAA-1008	RESERVED
USAA-1009	RESERVED
USAA-1010	U.S. Patent No. 5,740,361 (“Brown”)
USAA-1011	Myers, et. al., X.509 Internet Public Key Infrastructure Online Certificate Status Protocol – OCSP, RFC 2560, Network Working Group (June 1999) (“Myers”)
USAA-1012	Neuman, B.C. and Ts’o, T., Kerberos: An Authentication Service for Computer Network, ISI Research Report, ISI/RS-94-399 (September 1994 (“Neuman”)
USAA-1013	U.S. Patent Application Serial No. 12/210,926 (“the ‘926 Appln.”)
USAA-1014	U.S. Patent Application Serial No. 11/239,046 (“the ‘046 Appln.”)

USAA-1015 U.S. Patent No. 7,444,676 (“the ‘676 Patent”)

USAA-1016 U.S. Patent Application Serial No. 09/940,635

United Services Automobile Association (“Petitioner” or “USAA”) petitions for Inter Partes Review (“IPR”) under 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42 of claims 1-54 (“the Challenged Claims”) of U.S. Patent No. 8,266,432 (“the ‘432 Patent”). As explained in this petition, there exists a reasonable likelihood that USAA will prevail with respect to at least one of the Challenged Claims. The Challenged Claims are unpatentable based on teachings set forth in at least the references presented in this petition. USAA respectfully submits that an IPR should be instituted, and that the Challenged Claims should be canceled as unpatentable.

I. MANDATORY NOTICES UNDER 37 C.F.R §§ 42.8(a)(1), 42.8(b)(1), 42.8(b)(2), 42.8(b)(3) AND PAYMENT OF FEES UNDER 37 C.F.R § 42.103

Petitioner, USAA is filing this Petition, and is the real party-in-interest.

USAA is not aware of any disclaimers or reexamination certificates for the ‘432 Patent. USAA designates Michael Zoppo, Reg. No. 61,074, as Lead Counsel and Thomas Rozylowicz, Reg. No. 50,620, as Backup Counsel, both available for service at 3200 RBC Plaza, 60 South Sixth Street, Minneapolis, MN 55402 (T: 202-783-5070) or via electronic service by email at IPR36137-0007IP1@fr.com.

The Patent and Trademark Office is authorized to charge Deposit Account No. 06-1050 for the fee set in 37 C.F.R. § 42.15(a).

II. REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104

A. Grounds for Standing Under 37 C.F.R. § 42.104(a)

USAA certifies that the ‘432 Patent is available for IPR and is not barred or

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